

# LAW OFFICES OF BOBBI C. STERNHEIM

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August 26, 2021

Honorable Alison J. Nathan  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *United States v. Minh Quang Pham*  
12 Cr. 423 (AJN)

Dear Judge Nathan:

With the government's consent, defense counsel request a very brief enlargement of time - from Friday, August 27th to Monday, August 31st - to file defense motions and for a corresponding adjustment of the previously set schedule. The combination of travel and a COVID-scare requiring quarantining (test results negative) necessitate a few extra days to finalize and file defense motions.

1. The current filing dates:

- Defense Motions due by August 27th
- Government Response due by September 24th
- Defense Reply due by September October 1st

2. One previous request has been made on consent and granted.

3. The government consents.

4. There is no date for next appearance before the Court.

5. Currently, time has been excluded until August 27<sup>th</sup>. The defense consents to exclusion of time until August 31<sup>st</sup>.

6. The proposed filing dates:

- Defense Motions due by August 31st.
- Government Response due by September 27th.
- Defense Reply due by October 4th

Your consideration is greatly appreciated.

Very truly yours,

/s/

BOBBI C. STERNHEIM

cc: Government Counsel